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Office of Regulatory Staff
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May 13, 2021

VIA ELECTRONIC MAIL

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Cherokee County Cogeneration Partners, LLC, Complainant/Petitioner v. Duke
Energy Progress, LLC and Duke Energy Carolinas, LLC, Defendant/Respondent
Docket No. 2020-263-E

Dear Ms. Boyd:

Pursuant to S.C. Code Regs. Ann. 103-833, enclosed for filing, please find the South Carolina Office of Regulatory Staff's First Continuing Request for Production of Books, Records, and Other Information to Cherokee County Cogeneration Partners, LLC ("Cherokee"), which were electronically served on Cherokee on May 5, 2021.

Sincerely,

s/ Jenny R. Pittman

Jenny R. Pittman

cc: David Butler, Esquire, via email
JoAnne Wessinger-Hill, Esquire, via email
All Parties of Record, via email

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-263-E

IN RE: Cherokee County Cogeneration Partners,) LLC, Complainant/Petitioner v. Duke) Energy Progress, LLC and Duke Energy) Carolinas, LLC, Defendant/Respondent) _____)	SOUTH CAROLINA OFFICE OF REGULATORY STAFF'S FIRST AND CONTINUING REQUEST FOR PRODUCTION OF BOOKS, RECORDS AND OTHER INFORMATION
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**TO: JOHN J. PRINGLE, JR., ESQUIRE, ATTORNEY FOR CHEROKEE COUNTY
 COGENERATION PARTNERS, LLC:**

The South Carolina Office of Regulatory Staff ("ORS") hereby requests, pursuant to S.C. Code Ann. Regs. 103-833 that Cherokee County Cogeneration Partners, LLC ("Cherokee") provide responses in writing and electronically where required and under oath and serve the undersigned by May 17, 2021, to ORS at 1401 Main Street, Suite 900, Columbia, South Carolina, 29201. If you are unable to respond to any of the requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. As used in these requests, "address" means mailing address and business address. When asked to identify or provide a document, "identify" and "provide" means to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means

any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and sound recordings. Wherever in this request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- I. That responses be submitted under oath.
- II. In addition to the signature and verification at the close of the responses, the witness(es), employee(s), contractor(s), or agent(s) responsible for the information contained in each response shall be indicated at the bottom of each response.
- III. That all information be provided to ORS in the format requested.
- IV. That all responses to the requests below be labeled using the same numbers as used herein.
- V. Unless otherwise agreed, the requested information be provided electronically.
- VI. That if information requested is found in other places or other exhibits, reference shall *not* be made to those; instead, that the information be reproduced, and a copy be placed in the request in the appropriate numerical sequence.
- VII. That any inquiries or communications relating to questions concerning clarification of the information requested below should be directed to Jenny R. Pittman, Esquire [803.737.0749] of ORS.
- VIII. That this entire list of questions be reproduced and included in front of each set of responses.
- IX. That each question be reproduced and placed in front of the response provided.
- X. That all exhibits be reduced or expanded to 8 ½" x 11" format, where practical.
- XI. If the response to any request is that the information requested is not currently available, please state when the information requested will be available and provided to the ORS. This statement is not a waiver of the deadline for all other responses.

- XII. That in addition to the signature and verification at the close of Cherokee's responses, the name of the Cherokee witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XIII. This request shall be deemed to be continuing so as to require Cherokee to supplement or amend its responses as any additional information becomes available.
- XIV. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

REQUEST FOR PRODUCTION:

- 1-1 Produce copies of any correspondence, requests for information and responses, oral or written, from or to any other party in this Docket.

INTERROGATORIES

- 1-2 Please provide a status update on Cherokee's complaint related to this matter with the Federal Energy Regulatory Commission.
- 1-3 Please provide a status update on Cherokee's complaint related to this matter with the North Carolina Utilities Commission.

/s/ Jenny Pittman
Jenny R. Pittman, Esquire
South Carolina Office of Regulatory Staff
1401 Main St., Ste. 900
Columbia, SC 29201
Phone: (803) 737-0794
Email: jpittman@ors.sc.gov

May 5, 2021